

March 22, 2019

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Attorney General Brian E. Frosh
Office of the Attorney General
Identity Theft Unit
200 St. Paul Place
Baltimore, Maryland 21202
Idtheft@oag.state.md.us

Re: Data Security Incident

Dear Attorney General Frosh:

We represent Tower Legal Solutions (“TLS”) with respect to an incident involving the potential exposure of certain personal information described in detail below.

1. Nature of the possible security breach or unauthorized use or access

On February 19, 2019, TLS discovered that employees’ personal information may have been obtained by an unknown, unauthorized third party as the result of a phishing attack. After identifying unusual activity surrounding an employee’s email account, TLS immediately engaged computer forensic experts to determine whether information in the accounts was at risk. The investigation determined that an intruder gained access to the employee’s account, and could have viewed documents that contained employees’ names, addresses and Social Security numbers.

2. Number of Maryland residents potentially affected

Approximately sixty-four (64) Maryland residents were affected in this potential incident. TLS sent the potentially impacted individuals a letter notifying them of this incident on March 22, 2019. A copy of the notification sent to the potentially impacted individuals is included with this letter, which informs these Maryland residents about the 12 months of credit monitoring and identity theft protection services that is being offered to them.

3. Steps TLS has taken relating to the potential incident

Upon learning of this issue, TLS immediately engaged computer forensic experts to determine whether information in the account was at risk, and took steps to identify anyone potentially impacted by this incident. TLS has also taken steps to prevent a similar event from occurring in the future, including reviewing and revising their information security policies, resetting employees’ access credentials to ensure

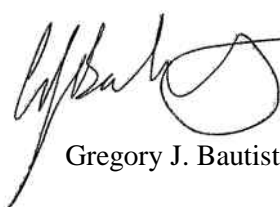
their systems are secure and implementing multi-factor authentication to their email environment for internal staff.

4. Other notification and contact information

If you have any additional questions, please contact me at Gregory.Bautista@wilsonelser.com or (914) 872-7839.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP



Gregory J. Bautista



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March 22, 2019

<<Name 1>>
<<Address 1>>
<<Address 2>>
<<City>><<State>><<Zip>>

Dear <<Name 1>>:

We are writing to inform you of an incident that may have resulted in the disclosure of your name and Social Security number. As an employee of Tower Legal Solutions, we take the security of your information very seriously and sincerely apologize for any inconvenience this incident may cause.

On February 19, 2019, we discovered that your personal information, including your name and Social Security number may have been obtained by an unknown, unauthorized third party as the result of a phishing attack. After identifying unusual activity surrounding an employee's email account, we immediately engaged computer forensic experts to determine whether information in the account was at risk. Our investigation determined that an intruder gained access to the employee's account and could have viewed documents that contained your name, address and Social Security number. While we did not identify specific activity around your information, we are sending you this letter out of an abundance of caution to provide you with resources you can use to protect yourself.

Please note, although we are not aware of any misuse of your information, we have retained **CyberScout**, an identity theft education and resolution specialist, to provide you with **Single Bureau Credit Monitoring** and **Triple Bureau Credit Report**¹ services at no cost to you. These services provide you with alerts for 12 months from the date of enrollment when changes occur to your Experian credit file. This notification is sent to you the same day that the change or update takes place with the bureau. In addition, we are providing you with proactive fraud assistance to help with any questions that you might have or in event that you become a victim of fraud. To enroll in these free services, please log on to <https://www.myidmanager.com> and follow the instructions provided. When prompted, please provide the following unique code to receive services: **<CODE HERE>**

We sincerely apologize and regret any inconvenience that this incident may cause you and remain dedicated to protecting your personal information. In addition, we have taken steps to prevent a similar event from occurring in the future, including reviewing and revising our policies and resetting employees' access credentials to ensure our systems are secure.

Should you have any questions or concerns, or to obtain additional information about the free services described above, please call the **CyberScout help line at 1-800-405-6108** and provide the fraud specialist with your unique code.

Sincerely,

A handwritten signature in blue ink that reads "Tony Valencia". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tony Valencia
Director of Human Resources

¹ These services require an internet connection and e-mail account and may not be available to minors under the age of 18 years of age. Please note that when signing up for monitoring services, you may be asked to verify personal information for your own protection to confirm your identity.

Additional Important Information

For residents of Hawaii, Michigan, Missouri, North Carolina and Virginia: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of Illinois, Maryland, Missouri, North Carolina, Oregon, and West Virginia: It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of Oregon:

State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Illinois, Maryland, North Carolina and Rhode Island:

You can obtain information from the Maryland and North Carolina Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
Consumer Protection
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Ave, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus by phone and online with Equifax (https://assets.equifax.com/assets/personal/Fraud_Alert_Request_Form.pdf) or Experian (<https://www.experian.com/fraud/center.html>). A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years. The phone numbers for all three credit bureaus are at the bottom of this page.

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
www.freeze.equifax.com
800-525-6285

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze
888-397-3742

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
freeze.transunion.com
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above.